

## **REMARKS**

Reconsideration and further examination of the subject patent application in view of the present Amendment and the following Remarks is respectfully requested. Claims 13-33 are currently pending in the application and stand rejected and claims 1-12 and 34 have been previously cancelled. Claims 13-17, 20, 23-27 and 30 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Masuhiro, (U.S. Pub. No. 2001/0003522) in view of Kelly (U.S. Pat No. 5,999,965), as has claims 18 and 28 over Masuhiro and Kelly further in view of Arndt et al. (U.S. Pat. No. 6,707,820). The drawing has been objected to under 37 CFR 1.83(a) and Claim 13 has been objected to for language informalities. Claims 13-29, 32 and 33 have been rejected under 35 U.S.C. §112 as being indefinite. Claims 13, 21, 22, 32 and 33 have been amended. After a careful review it is believed that the claims are in allowable form and therefore Allowance is respectfully requested.

The drawing has been objected to as failing to show the claimed plurality of network interfaces disposed within the automatic call distributor. This limitation has been removed by the present amendment.

Claim 13 has been objected to for the language coupling a call to an agent, and to “incoming call” in line 22. Claim 13 has been amended to correct these informalities. Claim 13 as well as 21, 22, 32 and 33 were rejected regarding the term “transaction processing system” and “a selected network, as was claim 20 (it is assumed this referred to claim 23 since claim 20 has no line 20) regarding the term “a first communications network.” Claims 13, 20, 21, 22, 32 and 33 have been amended to clarify the claims removing the term “transaction processing system”, and “a selected network” has been amended to “the selected network.” Regarding claim 23, line 20 “a first communications network” is believed to be proper under 35 U.S.C. §112 and refers to any one of the

plurality of networks through which the call is coupled..

The claims 13-17, 20, 23-27 and 30 have been rejected as obvious in view of Masuhiro and Kelly. Masuhiro discloses a telephone terminal 30, 31 connected to a PBX system 20, 21, where the two PBX systems are in turn, connected to each other via an IP network 10 or an ISDN link 11. It is important to note that Masuhiro shows PBX systems interconnected by various network topology. It does not teach or disclose an automatic call distributor (ACD) coupled to an agent telephone system (i.e. agent station) through a plurality of networks interfaces.

In contrast, applicant's claimed invention is an agent telephone system or agent station 32 coupled to an automatic call distributor (ACD) 16 by a plurality of networks through a plurality of network interface and a switch multiplexer. The agent station is not coupled to a PBX, as is shown in Masuhiro. There is a significant difference between an ACD and a PBX. In Masuhiro, the telephone terminal 30 is directly coupled to the switch or PBX 20. In applicant's invention, the agent system 32 is coupled to the ACD 16, which is in turn coupled to the external switch or PSTN 18. It is not a trivial matter to include the ACD 16 between the agent telephone system and the PSTN 18, and this feature is not disclosed in Masuhiro.

Again, in Masuhiro, two switches or PBX's are coupled by a plurality of networks. This is a common practice and is well known. The PBX or switch represents a major infrastructure investment by the operator, and is very expensive, and connecting two PBX systems via multiple networks is a very deliberate choice, not easily modified once implemented. Thus, the PBX system and the network link to other PBX systems is essentially fixed at the time of installation and not often modified.

In contrast, in applicant's claimed invention, a plurality of network interfaces are coupled

between the agent telephone system multiplexer and the ACD. This is a simple interface and permits a wide range of flexibility. For example, to install the Ethernet phone network 90 shown in Fig. 4, it is a simple matter of inserting an Ethernet card in the agent telephone system, which Ethernet card may cost as little as \$100. This is similar to installing an Ethernet card in a standard personal computer. It is a quick and inexpensive process. This is because such network interfaces couple the agent telephone terminal 32 with the ACD, and are not connected to the PBX or switch like the system in Masuhiro. Again, an ACD is not a PBX or switch and the two components cannot be equated--they are very different.

The claimed feature of an agent telephone system coupled to the ACD is missing in Masuhiro. In Masuhiro, the telephone is directly coupled to the PBX. In addition, the element of a plurality of network interfaces coupled to the switch multiplexer to couple a selected network from the ACD to an input line of the multiplexer to permit communication between a caller and the agent through the ACD is missing in Masuhiro. In addition, Masuhiro discloses a time division switch TDSW but the claim now clarifies that the multiplexer is a switch multiplexer. As described in the specification "input multiplexer 80 is a switch and is not a multiplexer in the sense of time-division multiplexing..." p. 7, lines 4-6. Kelly, while disclosing an ACD also fails to teach these features.

Because at least these significant element of applicant's claimed invention are missing from the system in Masuhiro and Kelly, the claimed invention is believed to be distinguishable over the combination. Accordingly, applicant asserts that claims 13 and 23 are allowable over Masuhiro and Kelly and that claims depending from claims 13 and 23, respectively, are allowable as depending from allowable base claims.

In the present case, none of the references, taken either individually or in combination,

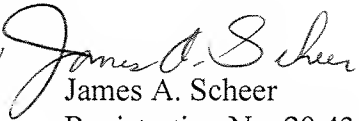
teaches or suggests the above discussed elements of applicant's claimed system. None of the secondary references add anything of significance to the combination, and none of these secondary references teaches or suggests the key features missing from Masuhiro and Kelly, namely that the plurality of network interfaces couple the agent telephone to the ACD, there is no connection between the agent telephone system and the external switch (i.e. PSTN) because the ACD is coupled between the agent telephone system and the external switch, and that there is no switch multiplexer used as claimed.

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits an early Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920.

Respectfully submitted,

WELSH & KATZ, LTD.

By   
James A. Scheer  
Registration No. 29,434

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WELSH & KATZ, LTD.  
120 South Riverside Plaza  
22nd Floor  
Chicago, Illinois 60606  
(312) 655-1500